

From: [Yvette Hopkins](#)
To: [Russell Wasem](#)
Cc: [Neil Anderson](#); [Laura Parsons](#); [Kim Wilson](#)
Subject: Re: Rodenticide Question from Region 2 - urgent - Monthly Call?
Date: 09/14/2011 04:25 PM

Yes I agree, rodenticide issues are clearly more important than an IT survey... Why don't I put it on the agenda as Rodenticide Update and see what happens. If a strictly enforcement angle is warranted, we can put the issue on October's FIFRA practitioners' Call as well which is on Tuesday the 11th (Kim Wilson is the contact for that call.)

Yvette

▼ Russell Wasem---09/14/2011 04:01:24 PM---Well if you are only willing to offer a #2 slot, we might need to get back to you... our content is

From: Russell Wasem/DC/USEPA/US
To: Yvette Hopkins/DC/USEPA/US@EPA
Cc: Neil Anderson/DC/USEPA/US@EPA, Laura Parsons/DC/USEPA/US@EPA
Date: 09/14/2011 04:01 PM
Subject: Re: Rodenticide Question from Region 2 - urgent - Monthly Call?

Well if you are only willing to offer a #2 slot, we might need to get back to you... our content is clearly worth a #1 slot ;)

Would we just be addressing the issue that came up today? If so, we will need to discuss further with OECA. Otherwise, I am willing to sit in on the call and take questions with the understanding that I may not have an answer for most enforcement related questions.

▼ Yvette Hopkins---09/14/2011 02:51:26 PM---The call is next Wednesday at noon. May I put you in the #2 slot? Say about 12:15 or so? From: Neil

From: Yvette Hopkins/DC/USEPA/US
To: Neil Anderson/DC/USEPA/US@EPA, Russell Wasem/DC/USEPA/US@EPA
Date: 09/14/2011 02:51 PM
Subject: Re: Rodenticide Question from Region 2 - urgent - Monthly Call?

The call is next Wednesday at noon. May I put you in the #2 slot? Say about 12:15 or so?

▼ Neil Anderson---09/14/2011 02:44:12 PM---That might be worthwhile. We did do a conference call with Regions back in June and explained exact

From: Neil Anderson/DC/USEPA/US
To: Carol Stangel/DC/USEPA/US@EPA
Cc: Laura Parsons/DC/USEPA/US@EPA, Richard Keigwin/DC/USEPA/US@EPA, Russell Wasem/DC/USEPA/US@EPA, Daniel Helfgott/DC/USEPA/US@EPA, Yvette Hopkins/DC/USEPA/US@EPA
Date: 09/14/2011 02:44 PM
Subject: Re: Rodenticide Question from Region 2 - urgent - please read & respond directly to Adrian

That might be worthwhile. We did do a conference call with Regions back in June and explained exactly this scenario - that non-conforming products would still be in the channels of trade (so to speak) for some time. Nevermind the products that are subject to the NOIC can continue to manufactured, distributed and sold until the cancellation process completes.

This might be an indication that we should prepare some guidance for regions and states for dealing

with the different scenarios that might be present now and in the coming months/years. Maybe this is something we can partner with one or more of the regions on to develop. Thoughts?

Neil Anderson
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Visit us on the web at www.epa.gov/pesticides/

▼ Carol Stangel---09/14/2011 02:37:08 PM---Thanks Laura! To avoid confusion, would it be worthwhile to discuss the status of the household rod

From: Carol Stangel/DC/USEPA/US
To: Laura Parsons/DC/USEPA/US@EPA
Cc: Neil Anderson/DC/USEPA/US@EPA, Richard Keigwin/DC/USEPA/US@EPA, Russell Wasem/DC/USEPA/US@EPA, Daniel Helfgott/DC/USEPA/US@EPA
Date: 09/14/2011 02:37 PM
Subject: Re: Rodenticide Question from Region 2 - urgent - please read & respond directly to Adrian

Thanks Laura!

To avoid confusion, would it be worthwhile to discuss the status of the household rodenticide bait products on an upcoming conference call with the Regions?

Just a thought. Thanks again!

▼ Laura Parsons---09/14/2011 02:17:57 PM---Hello everyone, I just spoke to Adrian and the products in question are in the distribution chain.

From: Laura Parsons/DC/USEPA/US
To: Kim Wilson/DC/USEPA/US@EPA, Adrian Enache/R2/USEPA/US@EPA, Russell Wasem/DC/USEPA/US@EPA, Neil Anderson/DC/USEPA/US@EPA, Don Lott/DC/USEPA/US@EPA, Erin Koch/DC/USEPA/US@EPA, Daniel Helfgott/DC/USEPA/US@EPA, Richard Keigwin/DC/USEPA/US@EPA, Carol Stangel/DC/USEPA/US@EPA, Yvette Hopkins/DC/USEPA/US@EPA, Scott Garrison/DC/USEPA/US@EPA
Date: 09/14/2011 02:17 PM
Subject: Re: Rodenticide Question from Region 2 - urgent - please read & respond directly to Adrian

Hello everyone,

I just spoke to Adrian and the products in question are in the distribution chain. They are conducting a sweep of market shelves in NYC looking for illegal pesticides. We do not know when these products were released for shipment, but there is no indication that they were released after June 2011.

I explained that products that have been released can be sold through the channels of trade until stocks are exhausted. We expect that there will be non-compliant products on the market shelves for some time.

Thanks,
Laura

Laura Parsons
Office of Pesticide Programs
703-305-5776

▼ Yvette Hopkins---09/14/2011 01:45:36 PM---Adrian, Either Rusty, Neil or Laura will give you a call at 732 321-6769.

From: Yvette Hopkins/DC/USEPA/US
To: Kim Wilson/DC/USEPA/US@EPA, Adrian Enache/R2/USEPA/US@EPA, Russell Wasem/DC/USEPA/US@EPA, Neil Anderson/DC/USEPA/US@EPA, Laura Parsons/DC/USEPA/US@EPA
Cc: Don Lott/DC/USEPA/US@EPA, Erin Koch/DC/USEPA/US@EPA, Daniel Helfgott/DC/USEPA/US@EPA, Richard Keigwin/DC/USEPA/US@EPA
Date: 09/14/2011 01:45 PM
Subject: Re: Rodenticide Question from Region 2 - urgent - please read & respond directly to Adrian

Adrian,

Either Rusty, Neil or Laura will give you a call at 732 321-6769.

Yvette Hopkins

▼ Kim Wilson---09/14/2011 01:21:44 PM---Hi, I just received a call from Adrian in Region 2, he has an urgent question regarding rodenticide

From: Kim Wilson/DC/USEPA/US
To: Erin Koch/DC/USEPA/US@EPA, Don Lott/DC/USEPA/US@EPA
Cc: Yvette Hopkins/DC/USEPA/US@EPA, Adrian Enache/R2/USEPA/US@EPA
Date: 09/14/2011 01:21 PM
Subject: Rodenticide Question from Region 2 - urgent - please read & respond directly to Adrian

Hi,

I just received a call from Adrian in Region 2, he has an urgent question regarding rodenticide products because he has people in the field now....he has found some products that do not comply with our Rodenticide Mitigation plan...please respond to Adrian directly....thank you!

I looked up the Risk Mitigation Decision for Ten Rodenticides (May 28, 2008) and it states:

"Pursuant to the terms of the voluntary cancellations, June 4, 2011 would be the last day for registrants to "release for shipment" (sell or distribute) rodenticide products not complying with the Risk Mitigation Decision. This limitation would apply to those registered both on and after the publication of the Federal Register announcing availability of the decision (June 4, 2008). Rodenticide products that do not comply with this Risk Mitigation Decision that a registrant releases for shipment after June 4, 2011, would be considered misbranded."
<http://www.epa.gov/oppsrrd1/reregistration/rodenticides/consumer-prod.html>

So, if Region 2 found that a producer sold/distributed noncompliant products AFTER June 4, 2011, those products would be considered misbranded, correct? Is this correct even though EPA may be in the process of cancelling these products?

The products in the Risk Mitigation decision are rodenticide bait products containing any of the following ten active ingredients: brodifacoum, bromadiolone, bromethalin, chlorophacinone, cholecalciferol, difenacoum, difethialone, diphacinone (and its sodium salt), warfarin (and its sodium salt), and zinc phosphide.